



KREINDLER & KREINDLER LLP | 750 Third Avenue | New York, NY 10017-2725

office: 212.687.8181 | fax: 212.972.9432 | www.kreindler.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: Dec 20, 2019

December 19, 2019


VIA ECF/CM

Hon. Lorna G. Schofield
United States District Judge
U.S. District Court Southern District of New
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1106
New York, NY 10007

New York, New York

December 20, 2019

APPLICATION GRANTED


HON. LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *United States v. Michael Holli*
19 Cr. 333 (S.D.N.Y.) (LGS)

Dear Judge Schofield:

I represent Michael Hollingsworth, who is scheduled to be sentenced by this Court on March 24, 2020 in connection with his November 25, 2019 plea of guilty to one count of accepting a gratuity in violation of 18 U.S.C. § 666. Mr. Hollingsworth is out of custody and we appeared for his presentence investigation report (PSR) interview at the Probation Department today.

In connection with the PSR, we are preparing the financial questionnaire and compiling the materials requested by the Probation Department. Because some of that information and those materials are either with other individuals (such as Mr. Hollingsworth's mother or his accountant), we need to coordinate with others to get them to the Probation Department. I intend to review the materials and financial questionnaire with my client before submitting them to the Probation Department, to make sure no information or documents have been overlooked and to verify the answers to the questions in the questionnaire. However, I will be leaving town as of December 20, 2019 and not returning until January 5, 2020, with limited computer access. Under S.D.N.Y. Standing Order 14-mc-141, within 55-days of the plea, the Probation Department is to complete and disclose its draft PSR.

In this case, the draft PSR would need to be disclosed on or before January 20, 2020. According to the probation officer preparing Mr. Hollingsworth's PSR, in order to complete her draft PSR by that date, she would need the financial questionnaire and all materials before the end of December. In light of my previously scheduled travel and limited access between December 20, 2019 and January 5, 2020, and the efforts that must be made to get the information and materials that will inform the answers to the financial questionnaire and to obtain the materials the Probation Department requests, I will not be able to get the probation officer the information and items she needs before the end of this month.

December 19, 2019

Page 2

I therefore respectfully request that this Court grant my motion to adjust the dates within the S.D.N.Y. Standing Order to allow the Probation Department to complete and disclose its draft PSR two weeks later, on or before February 3, 2020. The probation officer preparing Mr. Hollingsworth report told me today that she would not object to such a request and the assistant United States Attorney assigned to this case also has no objection.

Respectfully submitted,

/s/ Megan W. Benett

MWB:lr

cc: All counsel of record via ECF/CM